

**United States District Court**  
for the  
**Eastern District of Washington**

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

**May 19, 2021**

SEAN F. MCAVOY, CLERK

**UNITED STATES OF AMERICA**

**v.**

**CARLOS REYES**  
**EDUARDO REYES**  
**ROSA MARTINEZ-RODRIGUEZ**

**Case No. 4:21-MJ-07108-MKD-1**  
**4:21-MJ-07108-MKD-2**  
**4:21-MJ-07108-MKD-3**

**CRIMINAL COMPLAINT**

I, John M. D'Aquila, the complainant in this case, state that the following is true to the best of my knowledge and belief. Beginning on a date unknown but by on or about September 2020 until May 19, 2021, in the county of Benton in the Eastern District of Washington, the defendant(s) violated:

*Code Section*  
21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii), 846

*Offense Description*  
Conspiracy to Distribute 500 Grams or More of Methamphetamine

This complaint is based on these facts:

☒ Continued on the attached sheet.

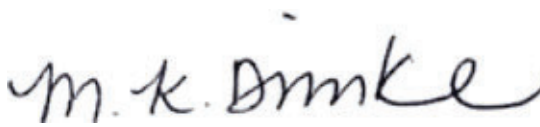
  
Complainant's signature

**John M. D'Aquila, TFO FBI**

Printed name and title

- ☐ Sworn to before me and signed in my presence.  
☒ Sworn to telephonically and signed electronically.

Date: 5/19/2021

  
Judge's signature

**Mary K. Dimke, United States Magistrate Judge**

Printed name and title

City and state: Richland, Washington

AUSA: CAB

County of Investigation: Benton

*In re Affidavit in Support of Criminal Complaint and Arrest Warrant for Carlos REYES, Eduardo REYES, and Rosa MARTINEZ-RODRIGUEZ*

**AFFIDAVIT**

STATE OF WASHINGTON                    )  
                                                          ) ss  
COUNTY OF BENTON                    )

I, John M. D'Aquila, being first duly sworn on oath, depose and states:

**INTRODUCTION AND AGENT BACKGROUND**

I, John D'Aquila, Task Force Officer, being first duly sworn on oath, deposes and states:

1. I am a full time Detective for the Pasco Police Department ("PPD"), and has been so employed since December 2014. In November 2014, I graduated the Washington State Criminal Justice Training Commission's 160 hour Correctional Officer Academy in Burien, Washington. I am currently a Task Force Officer with the Federal Bureau of Investigations.

2. In April 2018, I attended the classes, Basic Narcotic Investigations, Prosecuting Violent Crimes Associated with Drug Trafficking, Advanced Integration of Technology, Phones, Trackers, and Social Media into Investigations, Internet Profiling and Intelligence Gathering, and Fentanyl Facts and Fiction for Handling and Processing.

Additionally, I have assisted in criminal investigations involving drug and firearms trafficking. This participation includes acting as the case agent and assisting other law enforcement officers. Through this participation, I gained an understanding the manner in which controlled substances are manufactured, and/or distributed, and the various roles members of such organizations serve in furtherance of the organization's drug trafficking and money laundering activities. This also includes the role of firearms and other dangerous weapons.

3. The following is based upon my involvement in the investigation as well as information I received from other law enforcement officers, to include but not limited to those named in this affidavit. The information set forth in this affidavit is not intended to detail each and every circumstance of the investigation or all information known to me or other investigative participants. Rather, this affidavit serves to document the facts and circumstances necessary to establish probable cause exists that Carlos REYES, Eduardo REYES, and Rosa MARTINEZ-RODRIGUEZ conspired to distribute 500 or more grams of a mixture or substance containing methamphetamine, in violation of 21 U.S.C. §§ 841(a)(1), 846.

### **INVESTIGATION**

4. This has been a long-term investigation conducted by the FBI and various other law enforcement agencies. This investigation is also connected a Spokane-based FBI investigation into the drug trafficking activities of Molly BROWN (“BROWN”),



who is currently on federal supervision stemming from a drug-related previous federal conviction. Through that investigation, an electronic surveillance platform was installed allowing law enforcement to conduct electronic surveillance of BROWN's residence in Spokane, Washington. Beginning in approximately September 2020, FBI Spokane began to note various vehicles arrive at BROWN's residence. These vehicles were identified through my investigation as being associated with Carlos REYES ("C. REYES") and Eduardo REYES ("E. REYES").

5. In December 2020, a confidential human source ("CHS1")<sup>1</sup> advised that C. REYES, and E. REYES, were engaged in drug trafficking in the Tri-Cities area. CHS1 advised E. REYES lived at 6320 W Richardson Road in Pasco, Washington ("Richardson address") and C. REYES lived in Kennewick, Washington and had a white Jeep. I searched Washington State Department of Licensing ("WA DOL") records and learned there is a white Jeep Cherokee with license plate BRR1743, registered to C. REYES at E. REYES's identified Richardson address.

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<sup>1</sup> CHS1 is a paid FBI informant with prior felony drug convictions that appear to all stem from the same state offense / investigation and resulted in two state felony delivery convictions in approximately 1990. CHS1 was illegally in the United States when CHS1 began to work with Law Enforcement; however, in January 2013, CHS1 was granted deferred action by H.S.I. due to CHS1's cooperation with Law Enforcement. CHS1 has provided information to multiple law enforcement agencies that has been corroborated by investigators and deemed reliable. CHS1 has provided information leading to federal search warrants, indictments, arrests, and convictions. Prior to his/her involvement with Law Enforcement CHS1 had been involved in the drug subculture for several years, as a result, CHS1 has gathered knowledge and experience in how controlled substances are currently used, bought, sold, transported and delivered.

6. On December 23, 2020, members of the FBI conducted a trash pull on the Richardson address. The trash can was in the street in front of the residence. Parked in front of the location were several vehicles associated with E. REYES and C. REYES through the investigation. Several bags were removed from the can and brought to the PPD. Among the bags was a plastic grocery-type bag that contained the following:

- An orange shirt wrapping a vacuum sealed food saver bag and a Ziplock-type bag with suspected marijuana oil residue;
- A pair of disposable gloves;
- 5 vacuum sealed food saver bags, 2 of which had brown residue inside); and
- 6 Ziplock-type bags, 1 of which had the words “5 mil” written in marker on it and another had “2 mil” written in marker on it.

I know based on training and experience these words to mean 5,000 and 2,000 in Spanish. The “5 mil” bag had broken pieces of blue pills in it. The “2 mil” bag had white crystalline powder residue inside of it.

7. I believe, based upon training and experience, the blue pill pieces to be pieces of fentanyl-laced pills, the brown residue to be consistent with the appearance of heroin, and the crystalline powder to be methamphetamine. I placed the “2 mil” bag, and several of the Ziplock-type bags in a brown paper bag and placed random office objects in three other brown paper bags. I requested the assistance of Benton County Sheriff’s



Office K9 Detective Joe Mehline<sup>2</sup> and his K9 partner “Sawyer”. The objects were placed in a random order around the room and at no time was Detective Mehline advised which package had the suspected drug packaging inside. Detective Mehline ran K9 Sawyer around the 4 bags and advised of an alert to the odor of narcotics by K9 Sawyer on one of the bags. I retrieved the bag and observed the bag to contain the suspected drug packaging.

8. On January 15, 2021, I was contacted by Special Agent Brian Hoff with the FBI Spokane Safe Streets Task Force. SA Hoff sent photos from electronic surveillance of BROWN’s residence in Spokane, Washington. The photos were dated January 12, 2021 at approximately 9:39am. I recognized the vehicle in the picture to be an Audi associated to the REYES brothers (the vehicle was registered to C. REYES and E. REYES at the Richardson address), and the driver to be C. REYES and the passenger as E. REYES. C. REYES was carrying a blue backpack and both individuals walked

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<sup>2</sup> Det. Mehline and K9 Sawyer are a certified Narcotics K-9 Detection Team under Washington Administrative Code 139.05.915 [3b] and were certified on March 25, 2018. K9 Sawyer is a passive response narcotics detection K9. Sawyer exhibits a change in body posture and increased respirations when he first encounters the odors of controlled substances he is trained to detect. This is known as a change of behavior, alerting on the odor of trained narcotics. Sawyer is trained to detect the odors of Methamphetamine, Cocaine and Heroin. Sawyer is not, and has never been, trained to detect the odor of Marijuana. Upon reaching the closest available source of the odor, Sawyer will “indicate” on that location by automatically sitting, downing or pinpointing with his nose. Sawyer and Det. Mehline conduct monthly maintenance training. On January 27, 2020, K9 Sawyer and Det. Mehline recertified via the PPD. Currently they have a total of 235 applications or sniffs in the field. As a result, a total of 86 finds of narcotics/drug paraphernalia and/or items have been located.

toward BROWN's residence. TFO Matt Rose reported that the backpack appeared to be not as large or as heavy when leaving when compared to arriving. The two were reportedly at the location for approximately 27 minutes.

9. On January 17, 2021, I observed electronic surveillance from a court-authorized GPS tracker the Audi leave the area of the Richardson address at approximately 6:15am and travel directly to BROWN's residence in Spokane, Washington. SA Hoff sent me photos of the occupant of the vehicle when it arrived in Spokane and I recognized him as E. REYES. E. REYES appeared to have an object in the front of his hooded sweatshirt upon approaching the location. E. REYES left at approximately 8:50am and drove back to the Richardson address.

10. On February 11, 2021, I reviewed electronic surveillance of a Toyota Tacoma associated with the REYES brothers (registered to E. REYES at the time per WA DOL records), via court-authorized GPS data. Surveillance showed the Tacoma heading to the Richardson address. Camera footage of the Richardson address showed the vehicle arrive at the location at approximately 5:50pm. C. REYES entered the location, and at approximately 6:13pm, C. REYES, and a male believed to be E. REYES, exited the location and walked towards the Tacoma. The trunk of a gray Mercedes CLA 250 opened and E. REYES moved towards the trunk. A female, fitting the physical description of Jardia GARCIA (girlfriend of E. REYES), left the house and entered the passenger seat of the Tacoma. E. REYES reached into the trunk and appeared to lift an



item with a shoulder strap, but due to the hours of darkness, I could not identify the object. The object was placed in the rear driver side of the vehicle, E. REYES entered the driver seat of the Tacoma and left the location. Electronic surveillance of the Tacoma showed the vehicle headed northbound on Hwy 395. At approximately 8:27pm, the Tacoma parked near BROWN's residence in Spokane, WA. SA Hoff observed, via camera, E. REYES exit the vehicle carrying a duffel bag. TFO Rose later advised the bag appeared to have be very full and was almost pinched closed. At approximately 8:44pm, E. REYES returned to the vehicle and the duffel bag was visibly lighter and less full than when it entered. I observed via electronic surveillance that at approximately 10:43pm, the Tacoma parked at the Richardson address and E. REYES and GARCIA entered the residence.

11. On February 20, 2021, at approximately 12:24pm, I observed electronic surveillance of C. REYES and E. REYES at the Richardson address. They entered a Mercedes vehicle and left the location. Court-authorized location records for a phone identified for C. REYES showed it was traveling north towards Spokane. SA Hoff later reviewed electronic surveillance of BROWN's residence in Spokane. At approximately 3:24pm, C. REYES and E. REYES parked the Mercedes and entered the location carrying a yellow and black bag. At approximately 3:53pm, the two left the location and arrived back at the Richardson address at approximately 6:01pm.



12. On March 19, 2021, I observed electronic surveillance of the Richardson address. At approximately 5:09am a figure, believed to be E. REYES<sup>3</sup> entered the Mercedes vehicle and left the location. At approximately 12:42pm the vehicle arrived at the work place of GARCIA, where a Chrysler 200 associated with the REYES brothers was located (registered at the time to Marcelino Madrigal per WA DOL records). At 12:53pm, E. REYES returned to the residence the Chrysler. E. REYES then brought the Chrysler to Purely Storage<sup>4</sup> at 3302 Rd 44, Pasco, WA. E. REYES left the Chrysler at the storage facility and returned to the Richardson address in a black Corvette. At 5:36pm, E. REYES entered the passenger seat of an unlicensed red Camaro with C. REYES. The two left the location and at 5:50pm. E. REYES returned to the residence in the Chrysler. E. REYES then left the location in the Chrysler and backed it into the driveway of 7612 Budsage Dr<sup>5</sup>, Pasco, WA (“Budsage address”). At approximately 6:27pm, E. REYES exited the residence and placed an item in the rear passenger seat of the Chrysler. E. REYES entered the driver seat and C. REYES entered the passenger

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<sup>3</sup> Your affiant believed it to be E. REYES based upon previous surveillance. E. REYES has generally left for work at this time.

<sup>4</sup> On January 22, 2021, I learned that E. REYES rents storage unit 271. Furthermore, I had reviewed video surveillance of C. REYES and E. REYES accessing the unit.

<sup>5</sup> I have observed this as the new residence of C. REYES as of March 2, 2021. I have observed him come and go from the location with both physical and electronic video surveillance. I requested utility account information from Franklin County PUD. The account is in the name of Carlos S. REYES.

seat. I observed electronic surveillance of location records for the phone identified for C. REYES and GPS data for the Chrysler show the phone and vehicle travel northbound on Hwy 395. I advised SA Hoff and at approximately 8:40pm the two were observed, on video surveillance, arriving at BROWN's residence in Spokane. SA Hoff advised video surveillance showed E. REYES and C. REYES entering the residence. By 9:06pm, the two had left the location in the Chrysler.

13. On March 26, 2021, I observed electronic surveillance of the Richardson address. At approximately 6:18pm, C. REYES and E. REYES entered the Chrysler. I observed electronic surveillance of location records for the phone associated to C. REYES, and GPS data from the Chrysler show the phone and vehicle were headed northbound on Hwy 395 leaving Pasco. I advised SA Hoff. SA Hoff advised the two brothers entered BROWN's residence. At approximately 8:55pm, electronic surveillance showed the phone associated with C. REYES and the Chrysler and leaving BROWN's residence in Spokane<sup>6</sup>.

14. On April 4, 2021, at approximately 12:06pm, C. REYES was observed via electronic surveillance exit the Budsage address carrying a black and yellow tool bag. I observed the bag to be very full and to have weight to it. The bag was placed in the rear of a white Jeep Grand Cherokee and left the location. I advised SA Hoff. At approximately

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<sup>6</sup> Video surveillance was not clear enough to determine if the two entered with a bag. When the two left the location, an empty bag was carried from the location and placed into the rear driver's seat of the Chrysler.



3:47pm, video surveillance showed C. REYES arrive at the location, remove the tool bag from the vehicle, and walk it to the residence. At approximately 4:09pm, C. REYES left the location, but the camera was unable to see if he carried a bag out. At approximately 6:30pm, C. REYES returned to the Budsage address.

15. On April 9, 2021, I served an administrative subpoena to Purely Storage at 3302 N Rd 44, Pasco, WA. I observed video footage of March 30, 2021 at approximately 6:59pm, E. REYES drove up to unit 271. E. REYES entered the storage unit and removed a white plastic grocery bag containing a solid object. E. REYES then placed the object in the vehicle he arrived in and drove off. At 7:56pm, E. REYES returned to the storage unit, moved some items in the rear and in the trunk of the vehicle he arrived in, and entered the storage unit. Several minutes later E. REYES returned and opened the back driver side door and appeared to place an object inside. The object was not visible but by the positioning of E. REYES' arm and how he bent down, I believe he had an object in his hand. I know based upon training and experience that drug traffickers will utilize storage units to store controlled substances and drug proceeds to avoid detection from law enforcement.

16. On April 14, 2021, I observed electronic surveillance of the Richardson address. At approximately 11:56am, E. REYES left the location in the Mercedes vehicle, and by 12:04pm, per court-authorized GPS data, the Mercedes showed at the location of the storage unit. At 12:09pm, E. REYES returned to the Richardson address and he entered the



location. At 12:13pm, E. REYES left the location, and by 1:00pm, the vehicle was northbound on Hwy 395. I advised SA Hoff. At 2:16pm, electronic surveillance showed E. REYES park at BROWN's residence in Spokane. E. REYES entered the location with a backpack slung over a shoulder. At 2:46pm, E. REYES left the location with the backpack. At 4:44pm, E. REYES returned to the Richardson address.

17. On May 7, 2021, I reviewed electronic surveillance of the Budsage address. At approximately 6:12pm, C. REYES and a female, believed to be Rosa MARTINEZ RODRIGUEZ ("RODRIGUEZ") entered a white Honda Accord. I have observed this vehicle on a number of occasions during this investigation and knows this vehicle to have WA license BSM4494<sup>7</sup>. C. REYES entered the passenger side of the vehicle and RODRIGUEZ entered the driver side of the vehicle. At approximately 8:27pm, a white Honda Accord (no license plate visible) but consistent in appearance with the vehicle observed at the Budsage address, parked outside of BROWN's residence in Spokane. The trunk on the vehicle opened and C. REYES was observed at the rear of the vehicle. C. REYES walked toward the residence carrying a suitcase and a backpack. At approximately 8:30pm, C. REYES returned to the vehicle without the suitcase, but still

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<sup>7</sup> I first observed this vehicle at the Budsage address on March 2, 2021 and has observed it on multiple occasions since then. I searched WA DOL and observed the Honda is a 2017 white Honda Accord registered to Rosa C RODRIGUEZ Martinez at 7910 Squamish Ct in Pasco, Washington. I compared social media photographs of RODRIGUEZ to the female and believed them to be the same. The vehicle has been observed consistently enough at the residence to suggest RODRIGUEZ lives at the residence with C. REYES.

carrying the backpack. C. REYES walked around the back of the vehicle as if returning to the passenger door. At 10:43pm, the Honda vehicle was observed via electronic surveillance returning to the Budsage address. A male and female of fitting builds to C.REYES and RODRIGUEZ exit the vehicle and entered the Budsage address. Due to the hours of darkness, I could not see the faces of the occupants of the vehicle. Due to the fact the two returned in the vehicle, had similar builds as to when they left, and entered the residence, I believe the two to be C. REYES and RODRIGUEZ.

18. I know, based on training and experience that drug traffickers will travel long distances to drop off controlled substances to customers for distribution. I have observed C. REYES and E. REYES travel to BROWN's residence and stay for a short period of time in comparison to that of which they have driven. I have further observed bags enter the residence full and leave significantly less full or not at all. I believe, based upon training and experience, that C. REYES and E. REYES are a source of supply of controlled substances for BROWN and/or her coconspirators.

19. On May 19, 2021, multiple federal search warrants were executed in connection with this investigation. At the Budsage address, law enforcement located C. REYES and RODRIGUEZ. It appeared only one bedroom was being utilized as such. Among items of evidentiary value, law enforcement located approximately 52 pounds of methamphetamine (field-tested presumptive positive), approximately 1 pound of cocaine, approximately 50,000 blue pills (believed to be fentanyl-laced based on my training and

experience), approximately 3.5 kilograms of heroin (field-tested presumptive positive), and approximately \$500,000 in U.S. Currency. All of this was located in the bedroom closet. Both male and female clothing were located in the closet. The controlled substances were clearly visible in the closet. The U.S. Currency was located in the master closet, but up on a shelf. Drug ledgers were also located in the residence. The white Jeep was also searched and a firearm was recovered.

20. At the Richardson address, E. REYES and GARCIA were located. Among items of evidentiary value, law enforcement located approximately 5 firearms and thousands of rounds of ammunition as well as drug ledgers.

21. In the storage unit, law enforcement located approximately 7 kilograms of cocaine (field-tested presumptive positive), approximately 1 pound of methamphetamine (field-tested presumptive positive), approximately 50 blue pills (suspected to contain fentanyl based on my training and experience), and just shy of \$10,000 in U.S. Currency spread between a duffle bag and suitcase. There was also empty kilogram-size drug packaging on the floor as well as an empty box for a scale.


22. I was contacted by SA Hoff who served a search warrant on the residence of BROWN on May 19, 2021. SA Hoff advised that bulk controlled substances were recovered from the location.



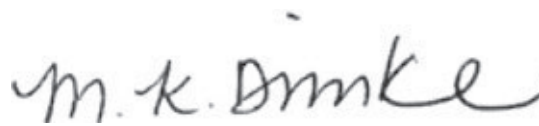
**CONCLUSION**

23. Based upon the facts and your Affiant's training and experience, I believe there is probable cause to conclude that C. REYES, E. REYES, and RODRIGUEZ, as well as others, are involved in continuing drug trafficking activity, in violation of 21 U.S.C. § 841(a)(1) and 21 U.S.C. § 846.

I declare under penalty of perjury that the statements above are true and correct to the best of my knowledge and belief.

  
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John M D'Aquila, TFO  
Federal Bureau of Investigation

Sworn to telephonically and signed electronically this 19th day of May 2021.

  
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Honorable Mary K. Dimke  
United States Magistrate Judge

